

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

ESJ, ppa Lucky Girl (Lisa) Beh
and Elliott Sackor, Sr., and Lucky Girl (Lisa) Beh,
and Elliott Sackor, Sr., Individually

Plaintiffs

vs.

United States of America, Mary Cullen, D.O.,
and Elliot Hospital

Defendants

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C.A. NO. 1:18-cv-956-SM

JOINT MOTION TO FILE MINOR'S PETITION FOR APPROVAL UNDER SEAL

Plaintiff ESJ, ppa Lucky Girl (Lisa) Beh and Elliott Sackor, Sr., and Lucky Girl (Lisa) Beh, and Elliott Sackor, Sr., Individually and Defendants Elliot Hospital have entered into a confidential agreement to resolve this matter. They move jointly, to file Plaintiffs' Petition for Approval on Behalf of a Minor and to have the written Petition sealed with any record or notes of any hearing on the proposed Petition; and to seal any findings by the Court beyond the Court's denial or approval of the Petition. Good cause exists to grant this motion, because the Petition to approve concerns sensitive issues to the Plaintiffs and their family warranting the preservation of their privacy and because confidentiality was a bargained-for condition of the resolution.

Further, because the case against Co-Defendants, the United States of America and Mary Cullen, D.O. will continue and those Co-Defendants are not parties to the resolution between

Plaintiffs and Elliot Hospital, the terms and conditions of the resolution are not known to them, and should not be known until such time as either a verdict is returned against them and/or a separate resolution has been reached with them.

In accordance with Local Rule 7.1(a)(2), the parties assert that given the straight-forward nature of this request, no memorandum is necessary in order for the Court to rule on this matter.

RESPECTFULLY SUBMITTED,
THE PLAINTIFFS BY THEIR ATTORNEY,

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/S/DAVID W. SUCHECKI, ESQUIRE
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RESPECTFULLY SUBMITTED
DEFENDANT, ELLIOT HOSPITAL
BY THEIR ATTORNEY,

/S/TODD HATHAWAY, ESQUIRE
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